

February 11, 1993

Mr. Ken Theison
On-Scene Coordinator
U.S. EPA, Region V
77 W. Jackson Boulevard HSE-5J
Chicago, Illinois 60604

RE: SELMER SITE, ELKHART, INDIANA--REVISIONS TO WORK PLAN

Dear Ken:

Attached are two sets of revised text and Figure 6 for WW Engineering & Science's (WWES) work plan for the Selmer site in Elkhart, Indiana. Revisions were made on pages 8 and 15; however, these revisions changed the pagination of the remainder of the text. The original work plan was prepared by WWES in August 1992, and revised in October 1992 and December 1992 to address U.S. EPA comments. We are hopeful that the current revisions will address your most recent concerns, so that the Consent Decree in this matter can be resolved.

The October revisions included submittal of a new copy of the text; revised Figures 3, 4, 5 and 6; revised pages for Appendix B; new SOP's for Appendix C; and a new work plan cover dated October 1992.

The December revisions were submitted by sending you revised page numbers 3, 5, 8, 13, 15 and 21.

The current set of revisions address the nine items of concern which you relayed to me on January 20, 1993 and were verified in my letter to you dated January 21, 1993 and in your response dated January 25, 1993. Our position on the nine items are as follow.

 Page 8 has been revised. The second to the last sentence of the first paragraph of Section 3.2.2 was lengthened to reference the possibility of deferring the sample date if the standing water level is thought to potentially drop enough to allow access. A new sentence was added at the end of the first paragraph of Section 3.2.3 referring to U.S. EPA's concurrence for deletion or relocation of Petrex sample locations where standing water prevents the installation of the sampling device.

- 2. Figure 6 was revised to show submittal dates of draft and final Technical Memorandum for both Phase I and Phase II. Obviously, the submittal of the final Technical Memorandum is dependent on U.S. EPA comments on the draft memorandum.
- 3. We do not think it is appropriate to drill deeper wells during Phase II. My notes of our conversation at the Selmer site on October 6, 1992, and my notes from the September 24, 1992 conference call to you, Liz Murphy (U.S. EPA), Frank Bentkover (DOJ), and the former owners of the site, reflect that the intent of Phase II is to assess the potential of impact of ground water and identify potential source(s) of the impact at the site. This objective will be achieved if the originally proposed Phase II investigation which did not incorporate deep wells is conducted.

I understand your concern that if TCE does exist at high enough concentrations, the TCE may sink within the aquifer as a dense nonaqueous phase liquid (DNAPL). However, if this is the case, there will still be a dissolved portion of TCE which will be detected in the shallow wells proposed for Phase II due to the close proximity of the wells to the alleged source area(s). If the results of the Phase II sampling indicate that high concentrations of TCE exist to cause concern of a potential presence of a DNAPL, then it may be appropriate to install deeper wells during Phase III. As already indicated in the work plan in Section 4.4, a scope of work for a potential third phase of work will be proposed, if appropriate, as part of the Phase II Technical Memorandum.

- 4. We will construct the Phase II monitoring wells with 10-foot screens set to intersect the water table. Page 15 (Section 4.1.4) has been revised to reflect this change.
- 5. We will use PVC casing and screens to construct the Phase II monitoring wells. Page 15 (Section 4.1.4) has been revised to reflect this change.
- 6. We will allow the Phase II monitoring wells to set for at least 48 hours after development, prior to sampling. Page 15 (Section 4.1.4) has been revised to reflect this change.
- 7. We will continue as previously planned to install temporary monitoring wells. We appreciate the U.S. EPA's concern to minimize the potential long-term cost to our client, but feel it is more appropriate to install the wells as temporary wells during Phase II.
- 8. We will continue to plan on the use of a Teflon bailer to sample the wells. Of the many studies published on ground water sampling devices, bailers are considered

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to provide a ground water sample equally as representative of true ground water conditions as a positive displacement pump. U.S. EPA's suggestion to use a positive displacement pump would be appropriate if the wells were deeper, thus requiring a larger volume of water to be purged. With the shallow nature of the Phase II wells, a bailer will be more time-efficient than a positive displacement pump. A bailer will also be much easier to decontaminate and will be less likely to cause concerns of cross-contamination between wells.

9. Brass liners are not appropriate to be used for soil sample collection for VOC's. The brass liners are typically used for collection of soil samples for laboratory permeability testing or other geotechnical laboratory tests where the soils are tested within the brass liner. If the soils are intended for VOC analyses, the soils must be removed from the brass liner either in the field or in the laboratory. This removal of the soils will cause the soils to be more disturbed than if originally collected in split-spoons. This disturbance of the soils will result in loss of volatile compounds and would not provide as accurate a laboratory analyses as would be possible using our originally proposed method; therefore, we do not feel it is appropriate to revise our work plan to incorporate the use of brass liners.

We look forward to U.S. EPA acceptance of the technical content of our work plan so that we can implement the proposed scope of work in the very near future.

If you have any questions, please contact me to discuss them at (616) 942-9600.

Sincerely,

WW ENGINEERING & SCIENCE

Environmental Services

Scott T. Dennis, C.P.G.

Senior Hydrogeologist

Enclosures

cc: Frank Bentkover - U.S. Department of Justice (1 copy)
Linda Bullen - McDermott, Will & Emery (3 copies)
Director, Waste Management Division, U.S. EPA (1 copy)
Ann Pizzorusso - North American Philips Corporation (2 copies)
Michael W. Steinberg - Morgan, Lewis & Bockius (1 copy)

Jim Woodsmall - Warrick, Weaver & Boyn (1 copy)